

J. LEONARD LEDBETTER
Division Director

GAD 049 712 201

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION 270 WASHINGTON STREET, S.W. ATLANTA, GEORGIA 30334

May 10, 1982-

GA - XXGXXX - 100 - 001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William Leggett Plant Manager Georgia-Pacific Corporation Resin Division P. O. Box 396 Vienna, GA 31092

RE: Notice of Violation

Dear Mr. Leggett:

Reference the inspection of the Georgia-Pacific Corporation - Resin Division plant by Ms. Verona Barnes and Mr. Edward Cook of the Industrial and Hazardous Waste Management Program to determine the compliance status of hazardous waste treatment, storage, and disposal facilities pursuant to the requirements of Sections 391-3-11-.08 and 391-3-11-.10 of the Georgia Rules for Hazardous Waste Management. The hazardous waste facilities inspected are listed as follows:

- 1) Wastewater storage tank.
- 2) Container storage area.

Each of these facilities was noted to be in violation of Georgia's Rules for Hazardous Waste Management, Chapter 391-3-11. As Georgia's Rules adopt and incorporate by reference the Federal Regulations found in Section 40 CFR, the following general facility violations are called to your attention:

40 CFR 265.13 "General Waste Analysis" - plant had not prepared waste analysis plans;

40 CFR 265.15 "General Inspection Requirements" - inspection records were not kept per a written schedule;

40 CFR 265.37 "Arrangements with Local Authorities" - proper emergency arrangements had not been made with local authorities, although verbal contact had been made;

Mr. William Leggett Georgia-Pacific Corp. May 10, 1982 Page Two

> 40 CFR 265.52 "Content of Contingency Plan" - no description of arrangements with local emergency officials was included in the facility's

> 40 CFR 265.73 "Manifest System, Recordkeeping, and Reporting - Operating Record" - a proper operating record, including waste analyses, had not been maintained at the facility;

> 40 CFR 265.110 -.120 "Closure and Post Closure" - a closure plan had not

40 CFR 265.142 "Financial Requirements" - no written cost estimate had been made for closure.

Facility specific violations were noted as follows:

Operation of the wastewater storage tank is in violation of 40 CFR 265.194 "Inspections" because weekly structural integrity and discharge containment structure inspections are not made and recorded in the

Since these requirements have been effective since November 19, 1980, we feel that June 15, 1982 provides sufficient time to comply with these requirements. A follow-up compliance inspection of the Georgia-Pacific Corporation - Resin Division plant is planned at that time.

Please find enclosed a copy of the referenced Georgia Rules for Hazardous Waste Management and, per your request, a copy of the inspection report. Should you have questions, please feel free to call at 404/656-2933.

Moses N. McCall, III, Chief

Land Protection Branch

MNM: vbk

Enclosures

cc: James Scarbrough, EPA Ron Presley

De Artment of Natural Resu Dees

ENVIRONMENTAL PROTECTION DIVISION



INSPECTION CHECKLIST INTERIM STATUS STANDARDS FOR TREATMENT STORAGE AND DISPOSAL FACILITIES

SECTION I FACILITY INFORMATION

SIC		INSPECTIO	N DATE 3-25-82
Georgia-Pacific Corp Resin Div.	GAD049712201 I.D.No.		Dooly
P. O. Box 396	Vienna	31092	912/268-4181
Mailing Address	City	Zip	Telephone Number
Name of Owner/Operator	Inspector's	Signatur	ę ·
TYPE FACILITY: <u>Treatment</u>	Storage		<u>Disposal</u>
☐ Tank	X Tank		Surface Impoundment
☐ Surface Impoundment	Surface Impou	ındment	Landfill
☐ Waste Piles	☐ Waste Piles		Other (Specify)
Land Treatment			
<pre>Incineration</pre>	Other (Specif	y)	
Chemical			
Physical			
☐ Biological			
☐ Thermal (Except Inci	neration)		
Other (Specify)			

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		SECTION II	EPT	CCEPT
		GENERAL FACILITY STANDARDS		MAC
1.	Fac	ility I.D. No. obtained?	х	
2.	Fac	ility notified Director relative to: (265.12)		
	(a)	Receiving waste from foreign source?	1	J/A
		Status as new owner or operator?	1	JA
3.	Doe	s facility have general waste analysis plan specifying: (265.13)		
	(a)	Parameters		×
	(b)	Test Methods	1	×
	(c)	Sampling Methods		x
	(d)	Frequency		x
4.		urity to include: (265.14)	1	
	(a)	Access control to active portion		
	(b)	24 hour surveillance system or	X	\vdash
		An artificial or natural barrier with a gate	†	
		Warning signs at entrances	x	
5.		r/operator inspections note: (265.15)		
	(a)	Malfunctions, deterioration, operator error and discharges	x	
	(b)	Inspections per written schedule		Ţ
	(c)			X
	(d)	Inspection log entries *(see comment 1) *	х	
6.		onnel Training Records Indicating: (Effective May 17, 1981)(265.16)		
		Job titles	х	
	(b)	Job descriptions	х	
	(c)	Description of continuing training	x	
	(d)	Completion of O.J.T or classroom	х	
		Training directed by person trained in Hazardous Waste	х	
	(f)	Trained personnel can respond effectively to emergencies	х	
7.	Preve of Ig	ention of Accidental Ignition or Reaction unitable or Reactive Waste by: (265.17)		
	(a)	Segregating and protecting waste from source of ignition/reaction	x	
	(b)	Posting of "No Smoking" signs	х	
		Proper control during handling	х	
8.		redness and prevention through: (Subpart C - 265.30)		
		Maintenance and operation to minimize possibility of fires, explosions and release of hazardous waste	x	

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	(b)	Equipment	U.E.	NO NO
	(0)	1) alarm system	x	+
		2) telephone or 2-way radio	X	+
		3) fire extinguishers	x	\dagger
		4) water		
	(c)	Testing and maintenance of equipment	X X	十
	(d)	Immediate access to communications and alarm system	x	
	(e)	Adequate aisle space	N	I/A
	(f)	Arrangements with local emergency response and hospital authorities		x
9.	Cont	ingency Plan and Emergency Procedure whereby: (Subpart D - 265.50)		
	(a)	Contingency plan written	х	
	(b)	Contingency plan contains:		
		1) personnel response actions	х	
		2) arrangements with local authorities		х
		names, addresses and phone numbers of qualified emergency coordinator	х	
		4) listing of emergency equipment	х	
		5) evacuation plan	v.	
		6) SPCC plan incorporation	х	
	(c)	Name(s) of designated emergency coordinator(s), trained and authorized to implement plan are listed	x	
	(d)	Evidence is provided that emergency coordinator will implement proper emergency procedures	x	
10.	Mani	fest System, Recordkeeping, and Reporting to include: (Subpart E - 265.70)		
	(a)	Procedures for proper execution of manifest (no waste shipped at this time)	N	
	(b)	Records of past shipments	N,	'A
	(c)	Manifest discrepancies noted resolved	N,	'A
	(d)	Written operating record		x
	(e)	Readily available records		_x
	(f)	Annual Report	N/	Ά
	(g)	Report on unmanifested waste	N	Ά
11.	Grour	ndwater Monitoring (Effective Nov. 19, 1981)(Subpart F - 265.90)	N	A
	(a)	Applicable facility		
	(b)	Is groundwater monitoring system operational		
	(c)	Number and placement of wells		
	(d)	Well integrity established through encasement		

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	(e) Sampling and analysis plan	VEC	3
	(f) Sampling and analysis records		+
	(9	g) Outline of groundwater assessment program		\dagger
	(i	h) Groundwater analyses submitted annually to Director	+	\dagger
12	2. C1	rosure and Post Closure (Post Closure-Land Disposal Only) (Subsect Co. 200		t
	(a	A) Adequate written closure plan available		
	(b) Adequate written post closure plan available		1
13	. Fi	nancial Requirements (Subpart H - 265.140) *	1	/2
	(a) Written estimate of closure cost available		T.,
	(b) Written estimate of post closure monitoring and maintenance of facility available (Land Disposal Only)	N/	A
		SECTION III		
		TSD FACILITY SPECIFIC STANDARDS		
1.	Con	tainers (Subpart I - 265.170) (drum storage)		
	(a)	. de de . de	_**	
	(b)			
	(c)	Containers kept closed	1	
	(d)	Containers managed to prevent rupture/leaks		
	(e)	Owner/operator make weekly inspections	1	
	(f)	Ignitable/reactive wastes are stored 50 ft. from property line		
	(g)	Incompatible waste/mixtures stored in the same container		
	(h)	Waste residues removed prior to reuse of container		
	(i)	Segregation and protection of incompatible waste(s)		
2.	Tanks	s (Subpart J - 265.190) (3-25,000 gal. tanks)		
		Threat of damage to structural integrity of tank, liner(s) or delivery system due to waste(s) and/or treatment reagents		_
	(b)	Uncovered tanks have 2 ft. (60 cm) free-	N/A	×
	(c)	Containment structure equal in volume	x	-
	(a) I	Continuous feed system(s) have a flow shutoff device	x	
((e) i	Records of additional analyses and trial runs for:		1
		l) incorporation of substantially different waste(s)	N/A	7
	. 2	?) new batch treatment process	N/A	-
•	* E	ffective July 16, 1981, except tanks and containers which were effective Nov. 19, 1980.	<u>.e.</u>	

	(f)	Owner/operator inspections	YES	QN
		1) discharge control equipment (once/day)	x	
		2) operational monitoring data (once/day)		†
		3) waste level (once/day)	×	<u> </u>
		4) structural integrity (once /day)		×
		5) discharge containment structures (once/week)		х
	(g)	Prior to tank storage ignitable/reactive waste must be:		
		1) rendered non-ignitable/non-reactive or	N,	/A
		2) tank(s) are protected from potential sources of ignition/reaction or		
		3) tank is used solely for emergencies		
	(h)		N,	A
	(i)	Incompatible waste(s) stored in same tank	N.	Ά
		Tanks for incompatible waste(s) are washed prior to reuse	N/	
3.	Surfa	ace Impoundments (Subpart K - 265.220)	N	/n
	(a)	Minimum of 2 ft. (60 cm) freeboard	147	
		Earthen dikes protected from erosion/deterioration		
		Records of additional analyses and test runs when substantial change in waste or treatment process		
	(d)	Owner/operator inspections		
		1) freeboard (once/day)		
		2) structural integrity of impoundment/ containment system (once/week)		
	(e)	Impoundment used for ignitable/reactive waste		
	(f)	Impoundment used for incompatible waste		
4.	Waste	Piles (Subpart L - 265.250)		
	(a)	Prevention of wind dispersal	N/2	A
	(b)	Record of analysis on each incoming movement		
	(c)	Leachate/runoff collection system (Effective Nov. 19, 1981)		
	(d)	Diversion of precipitation and run-on (Effective Nov. 19, 1981)		
	(e)	Liquid or waste containing liquids placed on pile		
	(f)	Prior to incorporation into a pile, ignitable/ reactive waste must be:		
		1) rendered non-ignitable/non-reactive or		
		2) protected from sources of ignition or reaction		

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	(g)	Incompatible waste(s) must be:	YES	2
	(9)		-	+
		1) rendered compatible or	-	-
		2) segregated and protected from other waste	-	-
		3) piled in areas <u>not previously used</u> for incompatible waste		
5.	Inci	nerators (Subpart 0 - 265.340)		
	(a)	Incinerator allowed to reach steady state condition		
	(b)	Record of waste analyses to determine:		
		1) steady state operating condition		
		2) BTU value		
		3) halogen content		
		4) sulfur content		
		5) lead and/or mercury content (if present)		
	(c)	Monitor and/or inspect instrumentation		
		1) combustion monitor(s)		
		2) emission control equipment		
		3) instruments to measure waste feed		
		4) instruments to measure auxiliary fuel feed		
		5) instruments to measure air flow		
		6) instruments to measure incinerator temperature		
		7) instruments to measure scrubber flow		
		8) instruments to measure scrubber pH		
		9) instruments to measure relevant level controls		
	1	0) color and opacity visually monitored hourly		
	1	1) daily inspection of complete incinerator and associated equipment		
	1	2) daily inspection of all emergency shutdown controls and system alarms		
6.	Them	mal Treatment (Subpart P - 265.370)		
	(a)	Steady state operating condition for continuous treatment	į	
	(b)	Cyclic operation for batch treatment		
	(c)	Record of waste analysis to determine:		
		1) steady state/cyclic operating conditions]
	·	2) BTU value		
		3) halogen content		
		4) sulfur content		
		5) lead and/or mercury content		
		6220		

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-	(d)	Monitoring instrumentation	YES	Ş
		1) temperature		ļ
		2) emission control		
		3) waste feed	 	
		4) auxiliary fuel feed		
		5) process flow		
		6) process level		
	(e)	Inspections once/day		
		1) leaks, spills and fugitive emissions		
		2) all emergency shutdown controls and alarm systems		
	(f)	Open burning of hazardous waste		
	(g)	Detonation/burning of explosives in accordance with buffer table		
7.	Chem	ical, Physical and Biological Treatment (Subpart 0 - 265.400)		
	(a)	Owner/operator take adequate precautions to prevent ignition, reaction or explosion during treatment		
	(b)	Where applicable does continuous waste feed equip- ment have a cut-off or bypass system		
	(c)	Record of addition analyses when:		
		1) treating a substantially different waste		
	,	2) using substantially different process or equipment		
	(d)	Record of inspections for:		
		1) discharge control and safety equipment		
		2) data from monitoring instrumentation		
		3) process equipment		
		4) discharge confinement structures and delivery system		
	(e)	Prior to placing into a treatment process, ignitable/reactive waste must be:		
		1) rendered non-ignitable/non-reactive or		
		2) the process is protected from potential sources of ignition/reaction		
	(f)	Incompatible waste types being placed in same process		
	(g)	Treatment equipment washed before and after processing incompatible wastes		

			i	1
8.	Lan	d Treatment (Subpart M - 265.270)	YES	2
	(a)	Waste is rendered less hazardous or non- hazardous prior to land treatment		
	(b)	Run-on diversion system (Effective Nov.19, 1981)		
	(c)	Runoff collection system (Effective Nov.19, 1981)		
		Record of additional waste analyses to determine:		
		1) EP Toxicity (Table 1, 261.24)		
		2) concentrations of listed hazardous wastes (261 Subpart D)		
		arsenic, cadmium, lead and mercury concentrations where food chain crops are grown		
	(e)	If food chain crops are grown on treated land, then:		
		owner/operator has demonstrated that hazardous constituents are not transferred to food crops in appreciable concentrations		
		2) records demonstrating the feasibility of growing food chain crops are kept at the facility and must include:		
		(i) tests for specific wastes and application rates		
		(iii) criteria for sample selection and sample size (iv) analytical and statistical procedures		
	•	3) food chain crops cannot be grown on land	\dashv	
		receiving cadmium (Cd) waste(s) unless:		
		(i) pH of soil waste mixture is ≥ 6.5 (ii) annual Cd application rate does not		
		exceed 0.5 kg/ha. on land used for tobacco, leafy vegetables and root		
		crops grown for human consumption		
((f)	Implementation of written unsaturated zone monitoring plan designed to:		
		1) detect vertical migration of waste/waste constituents		
		2) provide background monitoring on untreated soil in same area		
		3) monitoring plan must include:		
		(i) soil and soil pore water monitoring		
(g)	Records of application dates, rates, quantities and location of each hazardous waste treated.		
(h) (Closure and post closure plans address objectives outlined in 265,280		
(i)	Ignitable/reactive wastes are incorporated into the soil immediately so that the resulting mixture is nonignitable/nonreactive.		
(,	j) :	Incompatible waste(s) mixtures must not be treated on the same soil.		

	SECTION IV	ſ		Ī
	GENERATOR STANDARDS		Yes	i
1.	. Has the facility obtained an EPA ID No?	-		1
	If not, why not?		х	-
2.	. Is the facility a small quantity generator?			Ļ
3.	Has facility classified all solid waste as hazardous or non-hazardous?			
4.			N	_
5.			<u></u>	
	(a) Is date on which accumulation period began clearly marked?			_
	(b) Are containers properly labelled and marked prior to transport?		\exists	
	(c) Has the facility met the preparedness and prevention requirements for storage; the contingency plan and emergency procedures requirements for storage; and the personnel training requirements?			-
	(d) (1) Are containers inspected weekly for leaks and deterioration?		T	_
	(2) Are ignitable or reactive wastes stored at least 50 feet from the property line?	- 1		_
	(3) Are wastes stored in tanks? <u>If so</u> ,		1	_
	(4) Are wastes compatible with inner liner of tank?			
	(5) Is tank uncovered? <u>If so</u> ,		\top	~~
	(6) Does tank have 2 feet of freeboard or a containment, drainage or diversion structure with a capacity to hold the volume of the top 2 feet of the tank?			
	(7) Is the tank continuous feed? <u>If so</u> ,		\top	
	(8) Is tank equipped with a means to stop the inflow?			_
	(9) Is tank discharge control equipment inspected once a day?		\top	_
	(10) Is data gathered from pressure and temperature gauges daily?			
	(11) Is waste level inspected daily?	ļ	T	_
	(12) Is tank inspected for construction leaks or corrosion weekly?			_
	(13) Are dikes inspected for erosion and leakage weekly?			
	(14) Are ignitable or reactive wastes rendered non-ignitable or non-reactive prior to storage <u>or</u> are the tanks pro-tected from sources of ignition or reaction <u>or</u> are the tanks used solely for emergencies?			
	(15) Does tank comply with NFPA buffer zone?			
	(16) Are incompatible wastes stored in the same tank? <u>If so</u> ,		1	_
	(17) Are tanks washed prior to reuse?			_
6.	Does the facility have available copies of the manifests, annual and Exception Reports, waste analyses and test results?		x	-
7.	Has the facility made Exception Reports? If yes, has correct reporting procedure been followed?	N,	A	
8.	Does the generator import/export hazardous waste?		x	-

SECTION V INSPECTION REVIEW

COMMENTS:

 Although inspection logs are kept, not all requirements are covered.
 A hazardous waste container storage area is constructed at the facility, but has not been used to date.

Reas	son for inspection:	Routine	Other _	ISS
Disc	cussed with:			
1.	Name: William Leggett			Title: Plant Manager
				Telephone: 912/268-4181
2.	Name: Ron Presley			Title: Sr. Env. Fng.
	Address: P.O. Box 10504	11, Atlanta,	GA 30348	Telephone: _404/493-3493
Сору	of this report submitted			
1.	Name: same as #1 above	<u> </u>		Title:
	Address:			Telephone:
2.	Name: same as #2 above			Title:
	Address:			Telephone:
Photo	ographs: yes 🖂	no: No		
Sampl	es collected; yes	x no No.		Split
Revie		San fort		Review date: May 5, 1482
Attac	hments:	-		7 7
				000012



Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WA

270 WASHINGTON STREET, S.W. ATLANTA, GEORGIA 30334

JOE D. TANNER
Commissioner

J. LEONARD LEDBETTER
Division Director

June 2, 1982 XXX - 100 - 002

GAD 049 712 201

Mr. James H. Scarbrough, Chief Residuals Management Branch Hazardous Materials Division EPA, Region IV 345 Courtland Street, N.E. Atlanta, GA 30365

Dear Jim:

I had the pleasure today of becoming acquainted with Mr. Gene Raybuck, your assignee to Georgia for waste compliance, and one of the products of our meeting was that I would provide him with facility inspection itineries in order that he may become familiar with my compliance staff and Georgia's facilities. Honoring our agreement, I am hereby extending an invitation for Gene to visit two facilities with Mr. Howard Barefoot and Ms. Verona Barnes on June 9th and 10th. The facilities are Production Plating in Adel, and Georgia Pacific Corporation Chemical Plant, in Vienna. Howard and Verona plan to leave our office at 7:30 a.m. on the 9th and return around 4:00-4:30 p.m. on the 10th.

Please have Gene contact Howard or Verona if he can accompany them.

We look forward to continuing to work with your staff.

Sincerely,

Moses N. McCall, III, Chief Land Protection Branch

MNM: hbg

cc: John Taylor Howard Barefoot

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION 270 WASHINGTON STREET, S.W. ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER
Division Director

June 2, 1982

Mr. William Leggett Plant Manager Ga. Pacific Corp.—Resin Div. P. O. Box 396 Vienna, GA 31092

RE: Hazardous Waste Storage Permit
Application

Dear Mr. Leggett:

Your application for a hazardous waste treatment, storage and disposal permit has been received and is presently under review by this office.

In accordance with provisions of Section 391-3-11-.06 of the Georgia Rules for Hazardous Waste Management, your request to continue existing hazardous waste treatment operations during the permit review process is hereby granted contingent upon the following:

- Compliance with Chapter 391-3-11-.10 of the Georgia Rules for Hazardous Waste Management - "Standards Applicable to the Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities", and
- The continued operation of these facilities may not present an undue present or potential threat to the environment or health of humans.

This facility is subject to inspection for compliance with Section 391-3-11-.10 as well as other applicable provisions of the Georgia Rules for Hazardous Waste Management during and after this interim period. Please be aware that this letter in no way permits disposal of hazardous waste in an unpermitted hazardous waste handling facility.

Should you have questions, please contact the Division at 404/656-2833. Your cooperation in protecting the environment of Georgia is appreciated.

Sincerely,

J. Leonard Ledbetter Director

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JLL:bpk

cc: James Scarbrough Ron Presley





J. LEONARD LEDBETTER
Division Director

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION 270 WASHINGTON STREET, S W ATLANTA, GEORGIA 30334

July 13, 1982

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED



Mr. William Leggett Plant Manager Georgia-Pacific Corporation Resin Division P. O. Box 396 Vienna, GA 31092

Dear Mr. Leggett:

Please reference the follow-up inspection on June 10, 1982 of the Georgia-Pacific Corporation - Resin Division plant by Ms. Verona Barnes and Mr. Howard Barefoot of the Industrial and Hazardous Waste Management Program to determine the compliance status of hazardous waste treatment, storage, and disposal facilities pursuant to the requirements of Sections 391-3-11-.08 and 391-3-11-.10 of the Georgia Rules for Hazardous Waste Management. The hazardous waste facilities inspected are listed as follows:

- 1) Wastewater storage tanks
- Container storage area

All violations of Georgia's Rules for Hazardous Waste Management, Chapter 391-3-11, noted during the March 25, 1982, inspection have been corrected, including general facility violations. The Georgia-Pacific Corporation - Resin Division is currently in compliance with all hazardous waste requirements.

Please be advised that the wastewater storage tanks are no longer regulated as hazardous waste storage facilities by exemption under 40 CFR 261.6, "Special requirements for hazardous waste which is used, re-used, recycled, or reclaimed." The Part A permit application filed by Georgia-Pacific Corporation should be revised to reflect this change.

Mr. William Leggett July 13, 1982 Page Two

The facility will be periodically reinspected to insure continued compliance. Should you have any questions, please feel free to call at 404/656-2833.

Sincerely,

John D. Taylor, Jr.

Program Manager

Industrial & Hazardous Waste Management Program

JDT:vbk

cc: James Scarbrough, USEPA

Ron Presley

File: Georgia-Pacific Corp. - Resin Div., Vienna(R)

RECORD OF COMMUNICATION 828 210	4 265 4	A. M. Com	
PECOPD OF	PHONE CALL DISCUSSION	FIELD TRIP	CONFERENCE
RECORD OF COMMUNICATION 828 210	MOTHER (SPECIFY) REVE	w of Financia	of Sulmission
TO:	FROM: 100 1 CA	item checked above)	
d. Chat C	Micky Hay	TYCHANDER	3/2690/12
To: Jim Holdaway Chief - Waste Compliance Sec. SUBJECT	Waste Eng. Sect	TIME	
SH. Paritie - Financia	l'Assurance	Corn plian	C 264
facility & Georgia Par	itie: Spartan V	SILEM SCDE	34 19 19 19 5
TI Enternal Complicance	Dota for Fin	2 10 1 1 1 1 1 1	1 (125/07)
The Federal Compliance closure was July 8/982.	Our office recei	uctor resour	autetor
I from GA Me, tor all the	or tocilities or	n July 2, 19	87
However the submission	n is incomplete	and/or in	adequate
However the submission in the following area	S 2 Per 264, 143 (4)	147(f), 8	.151(9)
1) Line #2 of Alternative =	I format show	25 Amount	- of annual
aggrapte lightly co	verage to be	demonstrate	140
aggregate liability co	[BG+147(F)(iz.)(2) & 264.15	51(y) Part B
2) Time account away su	LMISSIANS WERE	MISSIMA	_
a) copy of independent a	certified public ai	countanty.	report
a) copy of independent of an examination of fix 264.147(4) (21).	iem's financial sta	etoment [204.19	13(A) (22)
b) special report from	independent certifi	red public o	100.
Also - spartanhurg, tacility	, should be the c	aly one und	er paragraph
Also - spartanting facility Lof C. F.O. letter in Should be under po conclusions, action taken or required	Region II, other	Region II for	cilities"
CONCLUSIONS, ACTION TAKEN OR REQUIRED	at 201-483	ti minor	itern)
Call Any Shaffer - Ha of Class I Violation Ical	(7/26) 11 Sand	to lov cour	JAMATIEN SAMOTAGE
we are supposed to no	this facility	of about	sidations
in a compliance of dee	L ASAR-PER	HQ Warle	2
			WARNING
CE-STATE 17 3. C. Been	oppierally Non	rico	HAS NOT
O: LOUY MCURLY File			
PA Form 1300-6 (7-72) REPLACES EPA HQ FORM 8300-	3 WHICH MAY BE USED UNTIL SUPP		
Service of the servic	Elm.	PLY IS EXHAUSTED.	an Losto

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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345 COURTLAND STREET ATLANTA, GEORGIA 30365

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AUG 5 1982

GA - XXGXXX 0- 200 - 001

Mr. Harry J. Kane
Executive Vice President Finance
Georgia-Pacific Corporation
900 S.W. Fifth Avenue and 133 Peachtree Road
Portland, Oregon 97204 Atlanta, Georgia 30303

Re: Financial Responsibility for your Region IV Hazardous Waste Facilities

Dear Mr. Kane:

We have received your submission dated June 30, 1982 to demonstrate financial responsibility for closure/post-closure and/or liability coverage under 40 CFR Parts 264 and 265, Subpart H, for your RCRA hazardous waste facilities in Region IV. All of your facilities in Region IV except for your Spartanburg, South Carolina facility are existing facilities with interim status to which the financial responsibility requirements of 40 CFR Part 265 Subpart H would generally facilities do not apply to the states in Region IV (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina and Interim Authorization to operate a state hazardous waste program in lieu of EPA. Therefore, state laws and regulations would govern financial responsibility for interim status facilities in those states.

In addition, North Carolina and Georgia are also authorized for Phase II Interim Authorization, Components A and B, which makes these states the permitting authority for new hazardous waste storage and incineration facilities in lieu of EPA. Therefore, you should contact the appropriate state regulatory agencies in Region IV to ensure that your existing facilities are in compliance with the applicable state financial responsibility requirements. For your convenience, we have enclosed a list of the names and telephone numbers of the appropriate persons in the state agencies in Region IV.

The only exception to the foregoing is that the federal financial responsibility requirements apply to those interim status facilities in states that do not have Phase II Interim Authorization for which this agency has requested submission of Part B of the RCRA permit application under section 122.22(a)(4) or who have voluntarily submitted Part B applications. In such cases, documentation of financial responsibility must be submitted as part of the Part B application as required by 40 CFR \$122.25(a). The only Georgia-Pacific facility to

which a Part B application request has been sent is your Louisville, Mississippi facility. However, we have not yet received this Part B application for this facility. Therefore, we will not consider your submission as to the Louisville, Mississippi facility until you have submitted the Part B application.

Your submission is appropriate for your Spartanburg, South Carolina facility since it was issued a federal RCRA permit. However, we have discovered certain deficiencies in your submission that render it incomplete and therefore in violation of the applicable requirements of 40 CFR Part 264, Subpart H. First, two documents that were to accompany your submission were missing. These were as follows: a copy of the independent certified public accountant's report on examination of your company's financial statements for the latest completed fiscal year. (40 CFR §\$264.143(f)(3)(ii) and 264.147(f)(3) (ii)) and (2) the special report from your company's independent certified public accountant required by 40 CFR \$\$264.143(f)(3)(iii) and 264.147(f)(3)(iii). Second, line number two of the Alternative II summary shows the "amount of annual aggregate liability coverage to be demonstrated as "o". This amount should be 2 million, exclusive of legal defense costs under 40 CFR \$\$264.147(a) and (f)(i)(c)(1). line number four of the Alternative II portion specifies the current bond rating of the most recent issuance but does not specify the name of the rating service as required by 40 CFR §\$164.143(f)(1)(ii)(A), 264.147(f)(1)(ii)(A), and 264.151(g), Part B.

You are hereby allowed twenty (20) days from the date of receipt of this letter within which to correct these deficiencies. Failure to correct these deficiencies within this time period could subject you to enforcement action under Section 3008 of RCRA, 42 U.S.G., \$6928.

If you have any questions regarding this letter, please contact either Mickey Hartnett of my staff at (404) 881-3433 or Keith Casto of our Regional Counsel's Office at (404) 881-2641.

Sincerely yours,

Charles R. Jeter

Regional Administrator

cc: Hartsill Truesdale



Bepartment of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION 270 WASHINGTON STREET, S W ATLANTA, GEORGIA 30334

10"

J. LEONARD LEDBETTER
Division Director

November 18, 1982

GAD 049 712 201

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Michael T. Ferraro
Plant Superintendent
Georgia-Pacific Corporation
Post Office Box 2270
411 Dividend Drive
Peachtree City, Georgia 30269

GA - XXGXXX - 100 - 004

Re: Follow-up Inspection of Georgia-Pacific - Resin Division Plant

Dear Mr. Ferraro:

On October 18, 1982, I accompanied Mr. Howard Barefoot of the Industrial and Hazardous Waste Management Program, on a follow-up inspection of the subject plant to determine the compliance status of hazardous waste treatment, storage and disposal facilities, pursuant to the requirements of the Georgia Rules for Hazardous Waste Management, Chapter 391-3-11. The hazardous waste facilities inspected are listed as follows:

1. Container Storage Area

Violations of Georgia's Rules for Hazardous Waste Management, Chapter 391-3-11, noted during the June 17, 1982, inspection, have been corrected including general facility violations. The facility will be periodically reinspected to insure continued compliance.

Should you have any questions in the interim, please call 404/656-2833.

Sincerely,

George M. Morris

Environmental Specialist Industrial & Hazardous Waste

Management Program

GMM:mg

cc: James Scarbrough, EPA

Ron D. Presley

File: Georgia Pacific - Peachtree City



Bepartment of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION 270 WASHINGTON STREET, S.W. ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER **Division Director**

November 18, 1982

TRIP REPORT

Site Name and Location: Georgia-Pacific Corporation, Resin Division

411 Dividend Drive, Peachtree City, Georgia 30269

Trip by:

George Morris, Environmental Specialist, Industrial &

Hazardous Waste Management Program

Accompanied by:

Howard Barefoot, Unit Coordinator, Industrial &

Hazardous Waste Management Program

Date of Trip:

10/18/82 - 10:30 a.m.

Officials Contacted:

Michael T. Ferraro, Plant Superintendent

Resin Division, Georgia Pacific Corporation

P.O.Box 2270, 411 Dividend Drive Peachtree City, Georgia 30269

Alice Marie Kahl, Quality & Service Control Supervisor

Same address as Ferraro

Ron D. Presley, Senior Environmental Engineer

Georgia Pacific Corporation

133 Peachtree Street, N.E., Atlanta, Georgia 30303

Reference:

ISS inspection of 6/17/82

Comments:

- 1. Facility will file amended Part "A" to include U-188 waste as present Part
- Paperwork violations of Chapter 391-3-11, including waste analysis plan, inspection schedule and logs, personnel training records, contingency plan, arrangements with local authorities, closure plan, and financial requirements, have been addressed. The documents, however, will have to be expanded and improved significantly to meet satisfactory Part "B" application requirements.
- 3. Facility specific violations related to the drum storage area have been

Trip Report - Georgia Pacific Resins November 18, 1982 Page 2

- 4. Mr. Presley stated they were continuing to develop data on the phenolic waste classified as "special waste" by this office and when prepared, the data will be presented in an effort to persuade EPD that the dry phenolic waste does not require special disposal.
- 5. Georgia-Pacific continues to talk about withdrawing their Part "A" and functioning in the generator status. Since this facility has already had its Part "B" called, they need to make a decision soon.

Conclusions:

Violations noted on ISS inspections of 6/17/82 have been corrected.

Recommendations and Follow-up Required:

Periodic inspections to insure continued compliance.

Photographs: None

Reviewed by:

Attachments: None

GM:mg



J. LEONARD LEDBETTER

Mr. Ron D. Presley

Georgia-Pacific Corp. 133 Peachtree Street, N.E.

Atlanta, GA 30303

Division Director GAD 049 712 201

Senior Environmental Engineer

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W. ATLANTA, GEORGIA 30334

April 8, 1983

GAD049712201

100

GA - XXGXXX - 100 - 005

RE: Request for Facility Status Changes for Georgia-Pacific Corp.-Resin Div., Vienna.

Dear Mr. Presley:

This will acknowledge receipt of your request for withdrawal of your application for a Hazardous Waste Facility permit.

Based on the information provided, withdrawal of your application is warranted and your permit application has been placed in our inactive files. As requested, your status has been changed to a generator and your EPA Identification Number has been retained.

Please be advised that withdrawal of your permit application invalidates any variance that you received to continue existing hazardous waste treatment storage or disposal during the permit review process and that based on our concurrence with your withdrawal request, the Federal Environmental Protection Agency will terminate your facility's interim status.

Should you wish to treat, store, or dispose of hazardous waste in the future, it will be necessary that a hazardous waste handling permit be issued, prior to the construction of such facilities, under authority of Section 8 of the Georgia Hazardous Waste Management Act and paragraphs .10 and .11 of Georgia's Rules for Hazardous Waste Management, Chapter 391-3-11.

If further clarification is needed on this matter, please feel free to contact Mr. George Morris at 404/656-7802.

Sincerely,

John D. Taylor, Jr. Program Manager

Industrial & Hazardous Waste Management Program

JDT:gmk:2726C

cc: James H. Scarbrough Moses N. McCall, III Bettye Mokgoatsane

Sid Gholson

File: Georgia-Pacific (Y)



Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION 270 WASHINGTON STREET, S W ATLANTA, GEORGIA 30334

/

J. LEONARD LEDBETTER

Division Director

GAD 000 828 210

April 21, 1983

GA - XXGXXX - 100 - 001

100

Mr. Ron D. Prosley Senior Environmental Engineer Ga. Pacific Corp. 133 Peachtree St., N.E. Atlanta, Georgia 30303

> RE: Request for Facility Status Changes for Ga. Pacific Gypsum Division, Hampton, GADOOO828210

Dear Mr. Presley:

This will acknowledge receipt of your request for withdrawal of your application for a Hazardous Waste Facility permit.

Based on the information provided, withdrawal of your application is warranted and your permit application has been placed in our inactive files.

Please be advised that withdrawal of your permit application invalidates any variance that you received to continue existing hazardous waste treatment storage or disposal during the permit review process and that based on our concurrence with your withdrawal request, the Federal Environmental Protection Agency will terminate your facility's interim status.

Should you wish to treat, store, or dispose of hazardous waste in the future, it will be necessary that a hazardous waste handling permit be issued, prior to the construction of such facilities, under authority of Section 8 of the Georgia Hazardous Waste Management Act and paragraphs .10 and .11 of Georgia's Rules for Hazardous Waste Management, Chapter 391-3-11.

If further clarification is needed on this matter, please feel free to contact Mr. Bert Langley at 404/656-7802.

Sincerely,

John D. Taylor, Jr., Program Manager

Industrial & Hazardous Waste
Management Program

JDT:blk:2794C

cc: James H. Scarbrough Moses N. McCall, III

File: Ga. Pacific, Hampton (Y)

GOOGUE



Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W. ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER July 31, 1984 **Division Director**

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. William Leggett, Plant Manager Georgia-Pacific Corporation-Resin Division Post Office Box 396 Vienna, Georgia 31029

6A - XXGXXX - 100 -306

GAD 049 712 201

RE: Notice of Violation Generator Requirements GAD049712201

Dear Mr. Leggett:

Reference the inspection of Georgia-Pacific Corporation, Resin Division, by Mr. George Morris and Mr. Jack Dempsey of the Industrial and Hazardous Waste Management Program to determine your company's compliance status with Georgia's Rules for Hazardous Waste Management, Chapter 391-3-11-.08, Standards Applicable to Generators of Hazardous Waste. As Georgia's Rules adopt and incorporate by reference the Federal Regulations found in Section 40 CFR, Part 262, the following violation is called to your attention for appropriate action:

40 CFR 262.34(a)(4) "Accumulation Time", because the facility has not updated the list of emergency coordinators and map of facility needs revision to reflect current operation. Also the personnel training program is not well documented and there is a need for a more formalized training program adhering

Please submit to this office no later than August 31, 1984 documentation which demonstrates that these deficiencies have been corrected. If the deficiencies included lack of required reports, records, plans, etc., submit such documents for

Please find enclosed a copy of the referenced Georgia Rules for Hazardous Waste Management, and a compliance checklist. Should you have any questions, please feel free to call at (404) 656-7802.

Howard L.

Unit Coordinator

Industrial & Hazardous Waste Management Program

HLB:gmw:020 Enclosure

cc: James Scarbrough

Mr. Ron Presley

File - Georgia-Pacific Corporation-Resin Division - Vienna - (R)

GA 049



J. LEONARD LEDBETTER **Division Director**

GAD 049 712 201

Mr. William Leggett Plant Manager Georgia-Pacific Corporation Resin Division Post Office Box 396 Vienna, Georgia 31092

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W. ATLANTA, GEORGIA 30334

6A - XX6XXX - 100 - 007

August 31, 1984

CERTIFIED MAIL RETURN RECEIPT REQUESTED

100

RE: Compliance Status Generator Requirements GAD049712201

Dear Mr. Leggett:

Reference your letter and data submission of August 21, 1984 wherein you addressed the violations outlined in our July 31, 1984 Notice of Violation.

Based on the letter and accompanying supporting data reviewed by this office, we have concluded that the previous violations of Georgia's Rules for Hazardous Waste Management, 391-3-11-.08, Standards Applicable to Generators of Hazardous Waste, have been corrected and the facility is now in compliance with the afore

We appreciate your cooperation in this matter and please be advised that the facility will be periodically reinspected to insure continued compliance. Should you have any questions in the interim, please call (404) 656-7802.

Sincerely,

Howard L. Barefoot Unit Coordinator

Industrial & Hazardous Waste

Management Program

HLB:gmw:052

cc: James Scarbrough

Ron Presley

File - Georgia-Pacific Corporation - Vienna - (R)

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RECORD OF	PHONE CALL DISCUSSION	——————————————————————————————————————
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Georgia-Pacific Corporation

Law Department

900 S.W. Fifth Avenue Portland Oregon 97204 Telephone (503) 248-7398

Kenneth M. McCaw, Jr. Group Counsel Pulp, Paper and Chemicals

November 14, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

EPA Region IV RCRA Activities 345 Courtland, N.E. Atlanta, Georgia 30308

Subject:

Georgia-Pacific Corporation

Vienna, Georgia

EPA I.D. #GADO49712201

Gentlemen:

Enclosed with attachments please find EPA General Form 1 and RCRA Form 3 submitted as a hazardous waste permit application on behalf of the referenced facility.

Very truly yours,

Kenneth M. McCaw, Jr.

Heat M. W. C.L.

KMM/hls

Attachments

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ONTINUED FROM THE FRONT		
'II. SIC CODES (4-digit, in order of priority)		
A. FIRST	c (enecify)	B. SECOND
2, 8, 6, 9 FORMALDEHYDE	7 2 8 4 2 WAX	EMULSIONS
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(specify)	c (specify)	
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III. OPERATOR INFORMATION		
	NAME	B. Is the name list I in Item VIII-A alse the
GEORGIA PACIFIC COR	PORATION	owner?
16		55 66 YES NO
C. STATUS OF OPERATOR (Enter the appropriate letter		D. PHONE (area code & no.)
F = FEDERAL M = PUBLIC (other than federal or states S = STATE O = OTHER (specify)	e) P (specify)	A 5 0 3 2 2 2 5 5 6 1
P = PRIVATE	56	A 5 0 3 2 2 2 5 5 6 1
E. STREET OR P.O. BOX		
OO S. W. FIFTH AVENU		
F. CITY OR TOWN	G.STATE H. ZIP CO	DDE IX, INDIAN LAND
1	, , , , , , , , , , , , , , , , , , , 	Is the facility located on Indian lands?
P. O. R. T. L. A. N. D.	0 R 9,7,2,0	0,4 ☐ YES XX NO
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A. NPDES (Discharges to Surface Water) D. PSD		
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B. UIC (Underground Injection of Fluids)	E. OTHER (specify)	
U 9	281804624540	specify)
16 17 18 - 30 15 16 17	30	AIR QUALITY
C. RCRA (Hazardous Wastes)	E. OTHER (specify)	
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1. MAP	30	
Attach to this application a topographic map of the area	extending to at least one mile beyond	property bounderies. The map must show
The outline of the facility, the location of each of its ex	isting and proposed intake and discha-	rge structures, each of its hazardous waste
reatment, storage, or disposal facilities, and each well water bodies in the map area. See instructions for precise	vnere it injects fluids underground. In requirements.	clude all springs, rivers and other surface
II. NATURE OF BUSINESS (provide a brief description)		
Production of formaldehyde, UF/PF res	sins and wax emulsions	
III. CERTIFICATION (see instructions)		
t certify under penalty of law that I have personally exa	mined and am familiar with the inform	ation submitted in this application and all
Millacilifients and that, based on my inquiry of those i	ersons immediately reconnsible for ol	staining the information contained in the
application, I believe that the information is true, accurate information, including the possibility of fine and im	ate and complete. I am aware that the	ere are significant penalties for submitting
. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	IC DATE CICAGO
	The same of the sa	C. DATE SIGNED
J.R. KUSE - SR. VICE PRESIDENT		
OMMENTS FOR OFFICIAL USE ONLY		
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Form 3510-1 (6-80) REVERSE

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C. SPACE FOR ADDITIONAL PROCESS CODES OR $^{\circ}$ OR DESCRIBING OTHER PROCESSES (code "T94"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

NGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CO	DE.
OUNDS	KILOGRAMS	
TONS	METRIC TONS	1

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

1.1	A. EPA		C. UNIT	D. PI	ROCESSES
N O N	HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	SURE (enter code)	1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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X-2	$D \mid 0 \mid 0 \mid 2$	400	P	T 0 3 D 8 0	(`)
X-3	$D \mid \theta \mid \theta \mid I \mid$	100	P	T 0 3 D 8 0	
X-4	$D \mid 0 \mid \tilde{0} \mid \tilde{2} \mid$, 1 , 0 			included with above

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	U	1	3	3	25	P	5	0 1						
13	U	1	5	1	1	Р	S	0 1						
14	U	1	5	4	2000	P	S	0 2	S 0 1	1 1 1				
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Continued from the front.		
IV. DESCRIPTION OF HAZARDOUS WASTEY	ntinued)	
E. USE THIS SPACE TO LIST ADDITIONAL	CESS CODES FROM ITEM D(I) ON PA	GE .
		/ ~~
1		
EPA I.D. NO. (enter from page 1)		
FGAD049712201		
TIE TO THE TOTAL T		
V. FACILITY DRAWING All existing facilities must include in the space provided	on page 5 a scale drawing of the facility (see instru	uctions for more detail).
VI, PHOTOGRAPHS		
All existing facilities must include photographs (a	aerial or ground—level) that clearly delineate	e all existing structures; existing storage,
treatment and disposal areas; and sites of future:	storage, treatment or disposal areas (see inst	ructions for more detail),
The state of the s	15. 1800 Mills (1914年 1917年) 15. 1800 Mills (1914年) 15. 1800 Mills (1914年) 15. 1800 Mills (1914年) 15. 1800 Mills (1914年)	
VII. FACILITY GEOGRAPHIC LOCATION		Mark to the same of the same o
VII. FACILITY GEOGRAPHIC LOCATION LATITUDE (degrees, minutes, & second)	onds) LONG	GITUDE (degrees, minutes, & seconds)
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1_ATITUDE (degrees, minutes, & second 3 2 0 4 3 4 N 65 66 67 68 69 - 71		8 3 4 7 4 0 W 72 7 75 76 777 79
VIII. FACILITY OWNER X A. If the facility owner is also the facility operator	as listed in Section VIII on Form 1, "General Info	8 8 9 4 7 4 0 W 72 73 76 77 79 79 79 79 79 79 79 79 79 79 79 79
VIII. FACILITY OWNER A. If the facility owner is also the facility operator skip to Section IX below. B. If the facility owner is not the facility operator	as listed in Section VIII on Form 1, "General Info	8 8 9 4 7 4 0 W 72 73 76 77 79 79 79 79 79 79 79 79 79 79 79 79
VIII. FACILITY OWNER X A. If the facility owner is also the facility operator skip to Section IX below. B. If the facility owner is not the facility operator 1. NAME OF FA	as listed in Section VIII on Form 1, "General Info	BBB 4 7 4 0 W 7 7 7 7 7 7 7 7 7
VIII. FACILITY OWNER A. If the facility owner is also the facility operator skip to Section IX below. B. If the facility owner is not the facility operator	as listed in Section VIII on Form 1, "General Info	BBB 4 7 4 0 W 7 7 7 7 7 7 7 7 7
VIII. FACILITY OWNER A. If the facility owner is also the facility operator skip to Section IX below. B. If the facility owner is not the facility operator 1. NAME OF FA	as listed in Section VIII on Form 1, "General Info as listed in Section VIII on Form 1, complete the ACILITY'S LEGAL OWNER 4. CITY OR TOWN	brmation", place an "X" in the box to the left and following items: 2. PHONE NO. (area code & no.)
LATITUDE (degrees, minutes, & second 3 2 0 4 3 4 N 69 - 71 VIII. FACILITY OWNER A. If the facility owner is also the facility operator skip to Section IX below. B. If the facility owner is not the facility operator 1. NAME OF FA	as listed in Section VIII on Form 1, "General Info as listed in Section VIII on Form 1, complete the ACILITY'S LEGAL OWNER	8 3 4 7 4 7 4 0 W Dormation", place an "X" in the box to ite left and following items: 2. PHONE NO. (area code & no.)
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VIII. FACILITY OWNER A. If the facility owner is also the facility operator skip to Section IX below. B. If the facility owner is not the facility operator 1. NAME OF FA S. STREET OR P.O. BOX T. IX. OWNER CERTIFICATION	as listed in Section VIII on Form 1, "General Info as listed in Section VIII on Form 1, complete the ACILITY'S LEGAL OWNER 4. CITY OR TOWN C G H 15 15	brmation", place an "X" in the box to the left and following items: 2. PHONE NO. (area code & no.) 55. 56 58. 59 61. 62 65. 5. ST. 6. ZIP CODE
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VIII. FACILITY OWNER A. If the facility owner is also the facility operator skip to Section IX below. B. If the facility owner is not the facility operator 1. NAME OF FA S. STREET OR P.O. BOX T. IX. OWNER CERTIFICATION I certify under penalty of law that I have personal documents, and that based on my inquiry of those submitted information is true, accurate, and comincluding the possibility of fine and imprisonment 1. NAME (print or type) J.R. KUSE, Senior Vice Preside.	as listed in Section VIII on Form 1, "General Info as listed in Section VIII on Form 1, complete the ACILITY'S LEGAL OWNER 4. CITY OR TOWN G ally examined and am familiar with the informse individuals immediately responsible for obsplete. I am aware that there are significant point. B. SIGNATURE	ormation", place an "X" in the box to the left and following items: 2. PHONE NO. (area code & no.) 5. ST. 6. ZIP CODE transition submitted in this and all attached braining the information, I believe that the brenalties for submitting false information,
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VIII. FACILITY OWNER VIII. FACILITY OWNER A. If the facility owner is also the facility operator skip to Section IX below. B. If the facility owner is not the facility operator 1. NAME OF FACE IS 116 3. STREET OR P.O. BOX TO SUBMITTED THE PROPERTY OF THE PROPERTY	as listed in Section VIII on Form 1, "General Info as listed in Section VIII on Form 1, complete the ACILITY'S LEGAL OWNER 4. CITY OR TOWN G ally examined and am familiar with the information in the information of the information of the information of the information of the information in the information of the in	primation submitted in this and all attached braining the information, I believe that the
VIII. FACILITY OWNER VIII. FACILITY OWNER A. If the facility owner is also the facility operator skip to Section IX below. B. If the facility owner is not the facility operator skip to Section IX below. B. If the facility owner is not the facility operator skip to Section IX below. I. NAME OF FA IX. OWNER CERTIFICATION I certify under penalty of law that I have personal documents, and that based on my inquiry of those submitted information is true, accurate, and comincluding the possibility of fine and imprisonment of the submitted information is true, accurate, and comincluding the possibility of law that I have personal documents, and that based on my inquiry of those submitted information is true, accurate, and comincluding the possibility of fine and imprisonment including the possibility of fine and imprisonment including the possibility of fine and imprisonment including the possibility of fine and imprisonment.	as listed in Section VIII on Form 1, "General Info as listed in Section VIII on Form 1, complete the ACILITY'S LEGAL OWNER 4. CITY OR TOWN C G AI AI AI AI AI AI AI AI AI A	promation", place an "X" in the box to the left and following items: 2. PHONE NO. (area code & no.) 5. ST. 6. ZIP CODE transition submitted in this and all attached braining the information, I believe that the braining the information is the brai
VIII. FACILITY OWNER VIII. FACILITY OWNER A. If the facility owner is also the facility operator skip to Section IX below. B. If the facility owner is not the facility operator 1. NAME OF FACE IS 116 3. STREET OR P.O. BOX TO SUBMITTED THE PROPERTY OF THE PROPERTY	as listed in Section VIII on Form 1, "General Info as listed in Section VIII on Form 1, complete the ACILITY'S LEGAL OWNER 4. CITY OR TOWN Ally examined and am familiar with the information in the information of the info	primation submitted in this and all attached braining the information, I believe that the

SPA Form 3510-3 (6-80) PAGE 4

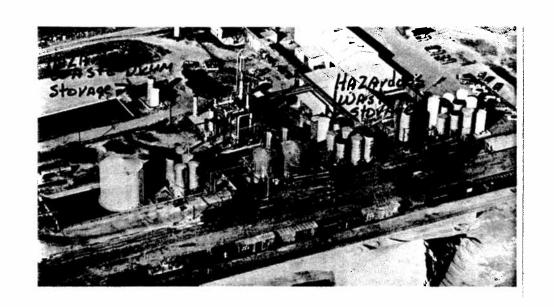
CONTIN

× = FENCHOT

Form 3510-3 (6-80)

SCALE: 1"= 72"

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Part A, Permit Process --- Internal Checklist

ID Numbe	r GADO 49712201 Inst Name GEORGIA-	PARIFIA C	30P
Refer to Form No:	PHASE ONE	Indicate by your initials	Valid Prmlg
1	T/S/D'Facility? (If No, return to respondent.)	Yes No	<u>Qate?</u>
3	Form 1 received?		
1	Form 3 received?		
1 & 3	Postmarked on or before November 19, 1980?	# —	
3	Date of operation entered?		
3	Date of operation on or before November 19, 1980?		
Notif. record	Notifier?		
i ecol d	Notified on or before August 18, 1980?	 	•
1	Form 1, XIII B signed?	117 —	
3	Form 3, IX B Signed?		
(If all te Acknowledg	n items above are initialed in the Yes column, general ement and indicate the trigger date here:	te Interim Statu	s ·
	PHASE TWO	1/1/	-
1	Unsure if regulated or non-regulated?	18.	
3	New facility?		
1 & 3	Core items missing? If Yes, indicate which items:	- +	
	Facility name; location; mail address; operation;	ator info ·	
	certification; process info; waste info; own	ner : sige	V
	PHASE THREE	-	
1 & 3	Non-core items missing? If Yes, indicate which I tems	• **	•
	Maps; photos; drawings; lat/long		
	Other observations and comments:	03/45 G	
	· ···· Re	eceived Date Sta	mp
Log out/Log		NOT	
on reverse s	ide. <u>(S</u>	GA 049 712 20 Stamp forms also	pı

Georgia-Pacific Corporation 2310 Parklake Drive, N. E.

) Part A Fir Blo

P.O. Box 105041 Atlanta, Georgia 30348 Telephone (404) 491-1244

VIENNA-RES STATE PERMIT APPLICATION

May 13, 1982

Certified Mail 7875442 Return Receipt Requested

Mr. John D. Taylor, Jr. Program Manager Industrial and Hazardous Waste Management Department of Natural Resources 270 Washington Street, S. W. Atlanta, Georgia 30334

Georgia-Pacific Corporation Vienna, Georgia - Resin Plant ID #GAD049712201

Dear Mr. Taylor:

As indicated in our letter of April 16, 1982, enclosed please find a revised EPA RCRA Part A application and a completed Georgia Hazardous Waste Permit Application for our Vienna facility.

If clarification of the information submitted or additional information is needed, please feel free to let me know.

Ron Presley

Senior Environmental Engineer Georgia-Pacific Corporation

RP/mh

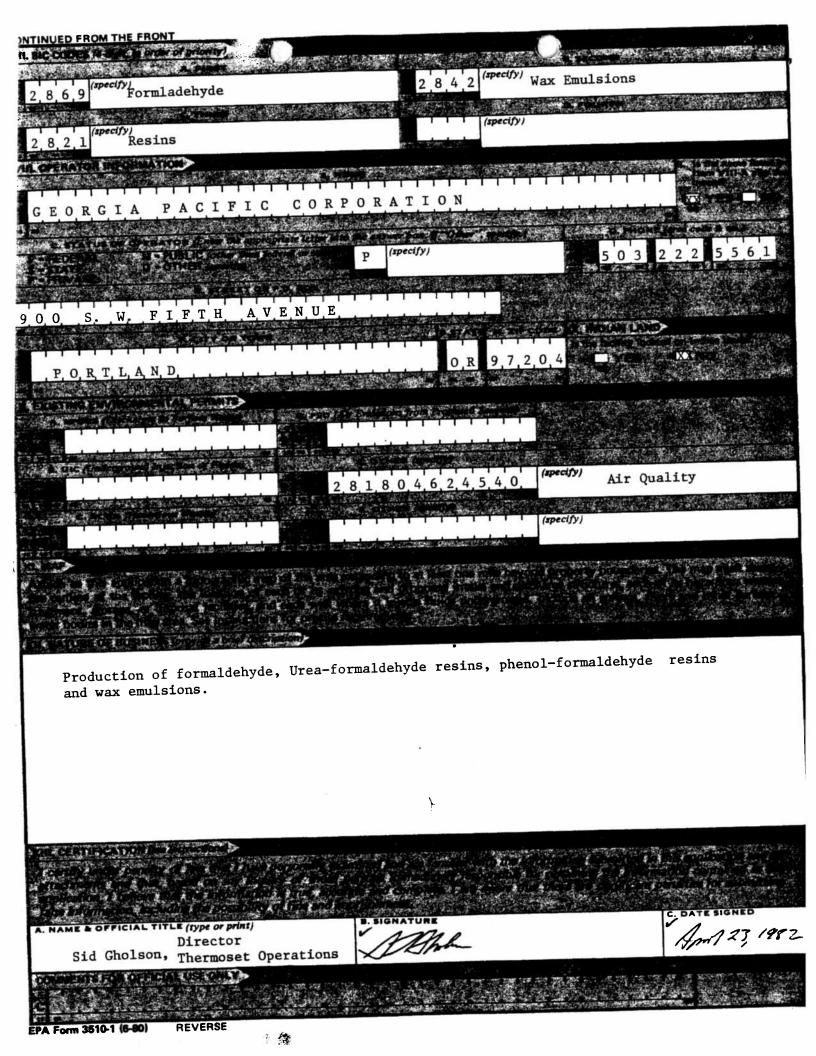
Enclosures 2

cc: Fred McCaig Vince Tretter Sid Gholson Beverly Gholson Bill Leggett

)

DOOLY

V. I. E. N. N. A EPA Form 3510-1 (6-80)



C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

				0
-	DESCRIPTION	OF	HAZARDOUS WASTE	.5
IV.	DESCRIPTION			The Lane of

- EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(a) from 40 CFR, Subpart C that describes the characterishandle nazardous wastes with a strong those hazardous wastes.
- ESTIMATED ANNUAL QUANTITY For each listed wests entered in column A estimate the quantity of that wests that will be handled on an annual besis. For each characteristic or toxic contaminant entered in column A estimate the total enquel quantitie of all the non-listed weste(s) that will be handled which possess that characteristic or contaminants.
- UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code, Units of measure which must be used and the appropriete codes are: A Stranger

4. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.				CODE
10.000 A P. A. M.	COD	METRIC U	UT OF MEASURE	
ENGLISH UNIT OF ME	A	KILOGRAN		. M.
POUNCE:		METRIC T	416	
TOMB				soulend units of men

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into It recitty records use any owner unit or measure for quantity, the water.

PROCESSES

PROCESS CODES:

D. PROCESSES

1. PROCESS CODES: For listed hazardone weeks. For such listed hazardout wests entered in column A school the goods trees the list of process codes contained in Item III

For listed hazardone waster. For each large nazaroous waste entered in column A seach the codes? from the flet of process contained in the flet of process that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes.

THE CHARGE OF TOXIC CONTAINABLE.

Note: Four spaces are provided for sintering process codes, If more are needed; (1) Enter the first three as described above; (2) Enter "000" in the Note: Four spaces are provided for sintering process codes, If more are needed; (1) Enter the first three as described above; (2) Enter "000" in the Note: Four spaces are provided for sintering process codes, If more are needed; (1) Enter the first three as described above; (2) Enter "000" in the Note: Four spaces are provided for sintering process codes, If more are needed; (1) Enter the first three as described above; (2) Enter "000" in the Note: Four spaces are provided for sintering process codes, If more are needed; (1) Enter the first three as described above; (2) Enter in the spaces provided on page 4, the line number and the additional codes.)

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

BOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described at the form a column A. On the same line complete columns S.C. and D by assignating the total samuel.

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns S.C. and D by assignating the total samuel.

2. In column A of the next line same the control of the transport of the same in column D (Z) on that line area.

3. In column A of the next line same the other EPA Hazardous Waste Humber that can be used to describe the hazardous waste.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shows in line number X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 906 pounds or year of chrome shavings from leather tenning and finishing operation, in addition, the facility will treat and dispose of three non-listed venter. Two weeks are corrosive only and there will be an estimated 200 pounds per year of each veste. The other weeks is corrosive and ignitable and there will be an estimated 200 pounds per year of the veste. Treatment will be in an incinerator and disposal will be in a teredist.

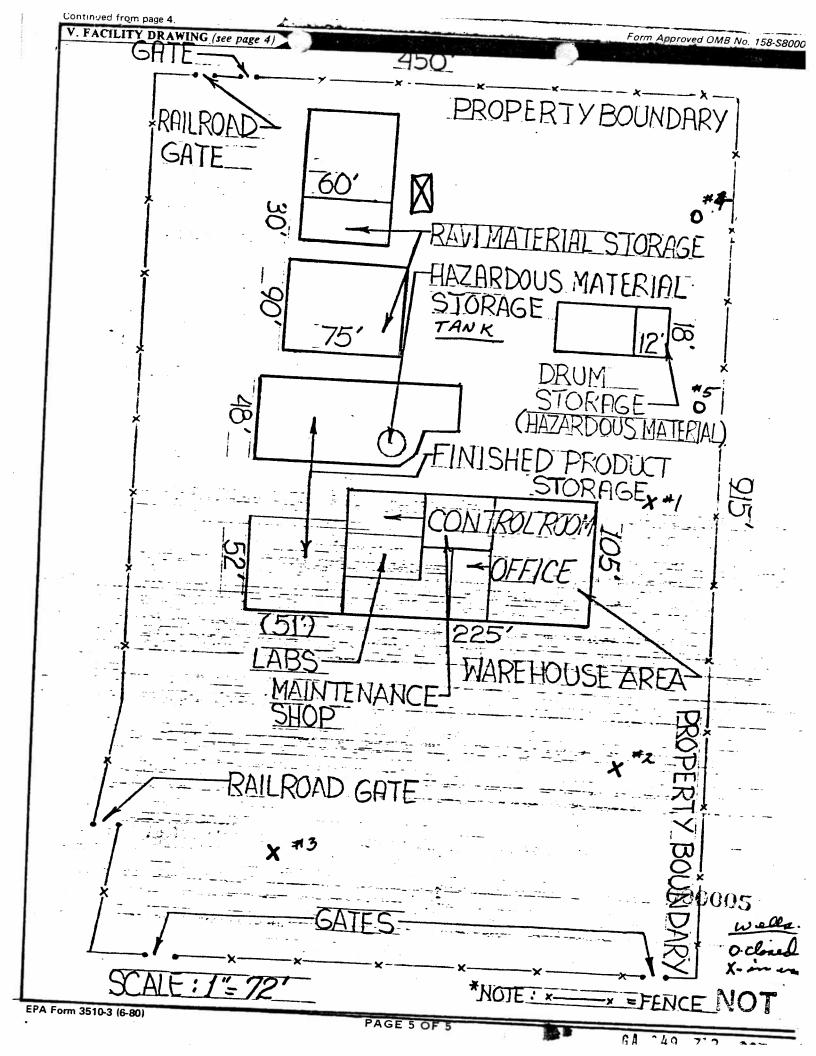
	A. EPA HAZARD.	ther wate, Treatment will be B. ESTIMATED ANNUAL QUANTITY OF WASTE	C	1. PROCESS CODES (If a code is not entered in D(1))
52 X-1		900	P	7 0 3 0 8 0
X-2	++++	400	P	T 0 3 D 8 0
1247	3 D 0 0 1	100	P	703080
X-	++++		111	included with above CONTINUE

Continued from page 2. NOTE: Phòtocopy this page before completing if ave more than 26 wastes to list. Form Approved OMB No. 158-S80004 EPA I.D. NUMBER (enter from page 1) FOR OFFICIAL USE ON W 1 W DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) A. EPA HAZARD. WASTE NO C. UNIT OF MEA-SURE (enter code) B. ESTIMATED ANNUAL QUANTITY OF WASTE D. PROCESSES N S 1. PROCESS CODES
(enter) (enter code) 2. PROCESS DESCRIPTION (if a code is not entered in D(I)) - to 1 F 0 0 2 50 P S 0 1 2 U 0 5 2 500 P S 0 1 3 U 1 5 4 2,000 P S 0 1 S 0 2 U 1 8 8 <u>5,0</u>00 P S 0 1 S 0 2 U 1 2 3 200 P S 0 1 6 U 1 2 2 10,000 P S 0 1 S 0 2 7 U 0 0 7 50 P S 0 1 8 2 U 0 50 P S 0 1 9 U 2 4 2 25 P S 0 1 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 6000004 25 26 EPA Form 3510-3 (6-80) CONTINUE ON REVERS PAGE X

EPA Form 3510-3 (6-80)

PAGE 4 OF 5

CONTINUE ON PAGE 5



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NV RONMENTAL PROTECTION DIVISION AND PROTECTION BRANCH
70 WASHINGTON STREET, S.W.
TLANTA, GEORGIA 30334
404)656-2833



CCC:411
NAME
DATE RECEIVED
For EPD Use Only

APPLICATION

FOR

HAZARDOUS WASTE FACILITY PERMIT

			E II DOWN NA	OIL I HU	ILIII PENIII	
i	INSTRUCTIONS: (see bo	ack)				
F	Please type or print.					
·	STATUS OF OPERATIO	N X E	xisting		New(Operation pro	jected to begin /
II	. TYPE OF OPERATION					mo day
	A. Storage	\boxtimes α	ontainers		Surface Impoundmen	nt
	B. Treatment	X Ta	ank		Incinerator	Surface Impoundment
			eclamation ecycling		Other	
	C. Disposal		nd plication		Landfill	
		L IM	rface poundment		Other	
III.	DESCRIPTION OF WAST	ES TO BE	HANDLED (lse EPA	Hazardous Waste No.	à Description)
	Wastes from the pr	coduction	of formald	lehvde.	UF & PF resins and w	
IV.	LOCATION OF OPERATI	ON (Desci	ribe below, he site or	and at facilit	tach a V.S.G.S. map	indicating location
v.	Georgia-Pacific Co					
	Owner's Name				eorgia-Pacific Corpo or's Name	
	Resin Division Owner's Address			w .	Leggett, Plant Man	ager ·
	P. O. Box 105042				or's Address	
	A+10-+- G+ 000/-				x 336	
	Atlanta, GA 30348	· · · · · · · · · · · · · · · · · · ·		Vi	enna, Georgia 31092	
	Owner's Telephone #	404/491-	8848	operate	or's Telephone # 9	12/268-4181
VI.	CERTIFICATION: I ce am familiar with and that based o obtaining the in accurate, and co	n my inqu formation	vimu of the		that I have person l in this and all at viduals immediately the submitted infor	vally examined and tached documents.
,	AUTHORIZED REPRESENT				V. Leggett, Plant Man	nager
	MAILING ADDRESS 8.	0. Box 3	36, Vienna,	Georgi	a 31092	600006
	SI GNATURE	gt _		_ DATE	4-26-82 TELEPHON	

INSTRUCTIONS: Please indicate the status and type of facility for which a permit is being requested by checking the appropriate boxes. The application must be complete and accurate and accompanied by required plans, data specifications, engineering & geological reports, designs and other pertinent information to determine compliance with the Hazardous Waste Management Act and the Rules for Hazardous Waste Management, Chapter 391-3-11.

